

4:58 pm, Sep 04 2024

AT BALTIMORE
 CLERK, U.S. DISTRICT COURT
 DISTRICT OF MARYLAND
 BY TTD Deputy

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

SCOTT ALAN JONES, JR.,

Defendant.

CASE NO. 1:24-mj-2152-CDA

FILED UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

Your affiant, Jonathan Miller, a Special Agent with the Federal Bureau of Investigation, being duly sworn, deposes and states as follows:

I. Introduction and Background

1. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

2. I have been a Special Agent with the FBI since June of 2022. Since June of 2022, I have been assigned to the FBI's Safe Streets Task Force in Baltimore, which investigates violations of federal criminal, drug, and firearms statutes. I have been responsible for investigations involving unlawful activities to include drug smuggling/trafficking, firearm offenses and violent crime occurring in the District of Maryland. I have authored, executed, and/or participated in search and seizure warrants for illegal narcotics and related paraphernalia. I have arrested and/or participated in the arrest of persons for violations of state and federal narcotics statutes and received specialized training in the area of illegal narcotics.

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3. I have been personally involved in numerous investigations concerning the possession, manufacture, distribution and importation of controlled substances into the United States of America. I have directly and/or indirectly participated in the arrest of well over 500 persons for violations of Controlled Dangerous Substances (CDS) laws, which has resulted in the seizure of various amounts of heroin, cocaine, marijuana and other illegal substances. I have been involved in the preparation and/or execution of well over 300 search and seizure warrants, during which time CDS, firearms, and United States currency have been recovered. I have surveilled numerous narcotic transactions on the streets of Baltimore City and within the Baltimore Metropolitan Area. As a result of these observations, thousands of arrests have been made for CDS violations and narcotics transactions. Furthermore, I have conducted surveillance and enforcement activities in other states as part of investigations of narcotics-related activity.

4. I have interviewed numerous confidential informants, cooperating witnesses, street level, mid-level, narcotics distributors/traffickers, and narcotics importers along with common narcotics users. This has provided me with an intimate insight into drug trafficking patterns and their related violence. I am also familiar with the counter-surveillance techniques utilized against law enforcement by drug traffickers.

5. I have testified and been qualified as a narcotics expert regarding the identification, packaging, and sale of CDS in the district, circuit, and federal courts in Baltimore, Maryland. I have also testified in state and federal grand juries on a number of occasions and as a result, the grand juries returned indictments against defendants. I have been the Affiant on approximately 25 prior Title III authorizations, and participated in numerous other Title III investigations as either part of a surveillance team or as a monitor. I have had the opportunity to listen to and interpret thousands of phone calls as they pertained to varying aspects within the narcotics field.

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6. Based on my knowledge, training and experience, I have become familiar with the methods of operations commonly used by individual drug-traffickers, including, but not limited to, the importation, manufacture, concealment and distribution of controlled substances. Additionally, I know that individuals engaged in the possession of distribution levels of CDS, in addition to bulk cash proceeds of sales, often possess firearms in furtherance of their drug trafficking activities, in order to safeguard the CDS and/or cash proceeds.

7. I submit this Affidavit in support of a criminal complaint and an arrest warrant for Scott Alan Jones, Jr. (hereinafter referred to as "JONES"). Based on the facts in this Affidavit, I respectfully submit that there is probable cause to believe that JONES committed the following offenses: 21 U.S.C. 841(a)(1) (Possession of Firearms in Furtherance of a Drug Trafficking Offense) and 18 U.S.C. 924(c) (Possession of Firearms in Furtherance of a Drug Trafficking Offense).

II. Probable Cause

8. On September 4, 2024, a Federal Search Warrant was executed at multiple locations in furtherance of an ongoing drug trafficking wire-tap investigation within the Baltimore Metro Region, authorized by the Honorable Adam B. Abelson, United States Magistrate Judge for the District of Maryland, on August 30, 2024. Two of the warrants authorized a search of the premises located at 118 South Prospect Avenue, Catonsville, Maryland, 21228, and the premises located at 1059 Parksely Avenue, Baltimore, Maryland 21223, in addition to the body of Scott Alan JONES Jr.

9. The investigation led investigators to believe that 118 South Prospect Avenue is utilized as the primary residence occupied by JONES, and his girlfriend Bethany Brunelle.

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10. Additionally, 1059 Parksley Avenue was identified as JONES' main stash location for significant amounts of controlled dangerous substances (CDS).

11. During the execution of the search warrant at 118 South Prospect Avenue, the primary residence for JONES, investigators seized seventeen (17) firearms, including but not limited to handguns, semi-automatic rifles, and shotguns. Affiants knows in his training and experience that individuals engaged in the possession of distribution levels of CDS, in addition to bulk cash proceeds of sales, often possess firearms in furtherance of their drug trafficking activities, in order to safeguard the CDS and/or cash proceeds.

12. In addition to the firearms, investigators seized approximately \$56,000 in bulk U.S. currency. During the execution of the search warrant at 1059 Parksley Avenue, investigators seized in excess of 500 grams of cocaine as well as multiple cocaine kilogram packaging materials and approximately 1000 grams of packaged marijuana. The suspected cocaine was field tested and tested positive for cocaine.

13. During the execution of the search warrant at 118 South Prospect Avenue, JONES was mirandized by investigators and stated narcotics were present at 1059 Parksley Avenue and further stated an undisclosed amount of cocaine could be found in the drawer within the residence. Investigators discovered cocaine inside of a drawer consistent with the statement made by JONES, which was separately packaged.

III. Conclusion

8. Based on the foregoing, I respectfully submit that there is probable cause to issue the requested criminal complaint and arrest warrant.

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Respectfully Submitted,

Jonathan Miller

Jonathan Miller, Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with
Fed. R. Crim. P. 4.1 and 4(d) this 4th day of September, 2024.



Honorable Charles D. Austin
United States Magistrate Judge
District of Maryland